

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

Swamiji Sri Selvam Siddhar
Plaintiff

VS

Case No. _____
EX-PARTE MOTION OF PLAINTIFF
FOR A PRELIMINARY INJUNCTION

VIOLET RAJKUMAR, ET AL.
Defendants

COMES NOW, Swamiji Sri Selvam Siddhar, a Plaintiff in this action filing his EX-Parte Motion, requesting the Court to grant a preliminary injunction concerning the misappropriation of Trade Secrets belonging to the Plaintiff, by the defendant "KAVITA JACOBSON"

and by the RICO Enterprise JACQUELINE REYNOLDS. Further, the Plaintiff is moving the court to enjoin "KAVITA JACOBSON"

and JACQUELINE H. REYNOLDS and their Agents, Privies not to use or indulge in or with the misappropriated Trade Secrets of the Plaintiff.

Plaintiff, also moves the court to enjoin all the defendants with an 'order' about **not** to destroy or delete or discard any and all Electronic Mail Communications (E-Mail Communications) concerning the Plaintiff, his Trade, Businesses, Temple organizations & Monasteries in any manner. All the defendants have extensively used the interstate wires which are **not** only limited to the E-mails. Those e-mails concerning the plaintiff and his business organizations will play a vital role in this litigation for the court to adjudicate this action

in a proper and timely manner. Swamiji is filing this Motion for a preliminary injunction order, Pursuant to Fed.R.Civi.P.65(b)(1).

The Plaintiff has attached this Motion, with his Verified Complaint and an Affidavit signed under penalty of Perjury pursuant to 28 U.S.C. §1746. Further the specific facts are clearly stated with the attached Affidavit/declaration, and also well stated in the 'verified Complaint'.

Any efforts made to give advance Notice, at this time of this litigation, will increase the damages for the Plaintiff. All the defendants have a 'thick Skin' even to 'obstruct Justice' steal, loot, misappropriate, defraud, whatever manner they wish. All these defendants are the 'employees' of a 'corrupt Rico enterprise' who have collectively worked for, they are association in fact of the RICO Enterprise and conducted the activities and 'helped' the RICO Enterprise to achieve its goals.

The Plaintiff has also attached a certification to that effect with this Motion.

Part of the Trade Secrets now in use by the defendant: KAVITA

JACOBSON and JACQUELINE REYNOLDS were Misappropriated the trade secrets from the APPLE laptop belonging to the Plaintiff, which were left in the Exclusive 'office room' in the Defendants ; KAVITA JACOBSON'S home in New York state.

The misappropriated Trade Secrets are so sensitive, rare, confidential, millions of confidential information of the followers who are the public & citizens of the United States.

The Plaintiff very well stated, even with undisputable "Direct Evidences" and this issuance of Preliminary injunction is well supported by the facts that the Plaintiff is likely to succeed on the Trade Secrets

claim. The beyond undisputable evidences attached with the Declaration will show to this court that, the Trade Secrets were not only misappropriated, however they were even 'casually used' without any due regards and care about that, those are the misappropriated Trade Secrets, belonging to some one (plaintiff), and they were not allowed or permitted to use the Trade secrets to injure Swamiji.

The following is the short definition of the misappropriation of Trade Secrets:

- 1) Acquisition of a Trade secret of another by a person who knows or has reason to know that the trade secret was acquired by improper means; 2) disclosure or use of a Trade secret of another without express or implied consent by a person who
 - a) used improper means to acquire knowledge of the Trade secret; or b) At the time of disclosure or use, knew or had reason to know that his knowledge of the trade secret was
 - 1) Derived from or through a person who had utilized improper means to acquire it; [or] (2) Acquired under circumstances giving rise to a duty to maintain its secrecy or limit its use; [or] (3) derived from or through a person who owed a duty to person seeking relief to maintain its secrecy or limit its use; or (4) Acquired by accident or mistake.

In this case, the beyond undisputable and that too, 'direct evidences' attached as Exhibits TS-1 to TS-8 (plaintiff still has more), will show to this court without any doubts that, Plaintiff's Trade Secrets were misappropriated by KAVITA JACOBSON & JOHN DOE and later went to the hands of the RICO ENTERPRISE JACQUELINE REYNOLDS, who was/is using it by herself and through her 'agents' and co-conspirators.

"injunctive relief is the most common sought form of relief in Trade secrets litigation. Indeed that equity will protect against the unwarranted disclosure or use of trade secrets is settled beyond pre-adventure" 4 Roger M. Milgrim, Milgrim on Trade Secrets § 15-02(1)(a) 2010. Citations omitted. Also see Dupont De Nemours & Co V Kolan Indus. 2012. [4th Circuit 2012].

"The text of the Uniform Trade secrets act provides the actual misappropriation may be enjoined"

According to the Supreme Court of Virginia, when a Virginia Statute empowers a court to grant injunctive relief, the party seeking an injunction is not required to establish the traditional pre requisites, i.e., irreparable harm and lack of an adequate remedy at law, before the injunction can issue. All that is required is proof that the statute or regulation has been violated.

The Trade Secrets in relevant part actual or threatened misappropriation may be enjoined. Upon application to the court, an injunction shall be terminated when the trade secrets has ceased to exist, but the injunction may be continued for an additional reasonable period of time in order to eliminate commercial advantage that otherwise would be derived from the misappropriation.

In this instance, the overwhelming direct evidences attached with the Declaration, and set of facts in the verified complaint will show to this court and would justify the issuance of 'preliminary injunction' by enjoining all the defendants and the RICO Enterprise JACQUELINE H REYNOLDS.

The misappropriated Trade Secrets and presently at the use of the RICO Enterprise and its RICO members are exceeding over \$700 Millions. Especially the NADI, (ancient palm Scripts) kept at the Swamiji's office space in the KAVITA JACOBSON'S home are the very special ATHRAVA VEDIC TRADE SECRETS which is not to known to anyone, 'before' it was misappropriated. Now the 2200 years Atharva Vedic Trade Secrets are compromised by these heartless walking evils with the 'blessings' of the RICO Enterprise. This RICO Enterprise is the poisonous tree and these 'walking Evils' are the very dangerous 'fruits of the poisonous tree.

Here, your Honor, the Plaintiff Swamiji was able to show even "the Direct Evidence" regarding the misappropriation and theft of Plaintiff Swamiji's Trade secrets were casually misappropriated and in possession of the individuals who are "not" the owners of those misappropriated properties, and Swamiji "did not" permitted those thieves to possess Swamiji's properties in such a manner at all.

In this instance, the Plaintiff moves this court for an appropriate "order" for a preliminary injunction, since the substantial threat that, the Plaintiff will suffer, will lead to an irreparable injury, in case this court did not allow the preliminary injunction, by enjoining KAVITA & the RICO ENTERPRISE and their privies, agents, employees, from no more usage of the Trade Secrets belonging to Swamiji in any manner either directly or indirectly.

Without an injunction from the court, there is no way to stop the continuing threats of unauthorized use of Trade Secrets by the Defendants, KAVITA and the 'associates' & JOHN DOE. The substantial likelihood of Plaintiff prevailing on the merits in this case concerning the misappropriation of Trade secrets is without any doubts, since the Plaintiff has attached even undisputable "DIRECT EVIDENCES" which even linking to federal agent who is the center part of the theft & Misappropriation of Trade secrets"

The threatened injury outweighs the threatened harm the injunction may do to the individuals referred as "defendants" to this lawsuit. The granting of the 'preliminary injunction' will "not" disserve the public interest, since without any question, the improperly misappropriated Trade Secrets, had millions of very sensitive records, with very personal sensitive informations of the public of the United States of America, which are 'not' limited to the public's birth details, family details, pictures of the minor girls, and husband and wives, sent by the public

to Swamiji, to keep their personal and confidential family members in the Atharva Vedic rituals. (For the court to understand that, it's a must and or a mandated religious Atharva Vedic condition that, without having either the Atharva Vedic astrological Charts and or the Pictures of the particular follower's pictures, the Atharva Rituals cannot be carried on, and only with one exception that, the particular follower should present himself or herself physically in the Atharva Vedic rituals.

Further the court to clear understand the seriousness behind this motion for an immediate preliminary injunction is, the Trade secrets misappropriated also had millions of financial records of the public from the United States, who sought the spiritual services from Swamiji and from his Religious organizations. Further the misappropriated records also had the public's bank and credit card details, which would exceed over 17 million public's financial details. Also the records misappropriated had over 200,000 health records of the United States public, who sought 'Herbal healings' herbal supplements' alternative medicine from Swamiji and his associate priests and the religious organizations.

The above stated information are to substantiate plaintiff's request/motion for an emergency preliminary injunction to enjoin certain individuals. Here none of the pre requisities has a fixed quantative value, rather, a sliding scale is utilized, which takes in to account, the intensity of each in a given calculus, which are all favors the plaintiff in this instance, with a requested 'preliminary injunction' which will keep the justice in tact and not to 'slip' to the known level of manifest of injustice. Again reinstate one more time that, tons of public's personal informations which are very private and highly sensitive were misappropriated and the 'preliminary injunction' will be well served to protect the justice and would respect

the law of the nation.

Wherefore the Plaintiff Swamiji Sri Selvam siddhar, a/k/a Annamalai Annamalai, a/k/a Dr. commander selvam, respectfully moves this court for an immediate 'preliminary injunction' with any more remedy in equity the court can grant..

Respectfully Submitted on this day of 29. february, 2016.



Swamiji Sri selvam Siddhar
Hindu High Priest
Siva Vishnu Temple Complex
7600, Bayway Drive
Baytown, TX-77520
E-Mail: avtemple@aol.com
Temporary Address:
C/O US Penitentiary
PO BOX-1000
Marion, IL-62959

1. The misappropriated Trade Secrets are worth over \$700 Million.
2. The misappropriated trade secrets has very high profile United states public/citizens 'very sensitive' and familial details.
3. The misappropriated Trade secrets has highly privileged Clergy-communicant details, that too with relates to several high power government employees, which also includes some judges, who were consulted by Swamiji who sought religious help from Swamiji when those federal judges and government employees went through some serious profession and family related hurdles and turmolis.

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK
NEW YORK DIVISION

Swamiji Sri Selvam Siddhar
Plaintiff

V

VIOLET RAJKUMAR
CHABLALL RAJKUMAR
KAVITA JACOBSON
PETER S SMITH
MANOJ KUMAR BEHERA
ERIC JACOBSON
&
JOHN DOE 1-10


Case No. _____

RELIEF SOUGHT

Plaintiff Swamiji Sri Selvam Siddhar, moves the court for an order for him to proceed on this action without prepaying fees or costs.

Plaintiff Swamiji Sri selvam Siddhar has also attached herewith his declaration pursuant to 28 U.S.C. § 1746, which is signed under penalty of perjury to that effect.

Respectfully Submitted on this day, 29 February, 2016.



Swamiji Sri selvam Siddhar
Hindu High Priest
Shiva Vishnu Temple Complex
7600 Bayway Drive
Baytown, Texas-77520
E-Mail: avtēmp̄le@aol.com

Temporary address:
C/O US PENITENTIARY
PO.BOX-1000
Marion, IL-62959

[Caption. Form No. 54:450]

DECLARATION/ AFFIDAVIT OF, COMMANDER SELVAM AKA ANNAMALAI ANNAMALAI
AKA SWAMIJI SRI SELVAM SIDDHAR

County of WILLIAMSON

State of ILLINOIS

I AM MAKING THIS DECLARATION
PURSUANT TO 28 U.S.C. 1746.

I, Annamalai Annamalai,], being duly . deposes and states:¹

1. My name is Annamalai Annamalai, and. I am over 18 years of age.

2. I am fully competent to make this affidavit, and I have personal knowledge of the facts stated in this affidavit. To my knowledge, all of the facts stated in this affidavit are true and correct.

3. I am the plaintiff in this action. I make this affidavit pursuant to 28 U.S.C. § 1915(a)(1) in support of my request to be able to file and proceed with this action without the prepayment of costs, filing fees, or other fees or the posting of security for those costs or fees.

4. I am not [am or am not] currently employed. [Add if currently employed: My employer's name is N/A, and my employer's address is N/A.]

5. My last [current or last] salary from employment as a High Priest [is or was] \$ see the "note" [week or month or whatever]. [Add if no current employment: I was last employed on 11/13/2013 (date)].

6. Apart from employment for a salary or wages, in the last 12 months I received the following
090 N/A 1

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Note: The Temple/Monastery took care of all the expenses.

1. The facility where I am held advised that, they will 'not' sign with notary, for these kinds of actions. Advised me to file under and pursuant 28 U.S.C. 1746.

56820379
sss503

sums from these sources:

- a. Business, profession, or self-employment \$ N/A [dollar amount or "none"].
- b. Rent payments, interest, or dividends \$ N/A [dollar amount or "none"].
- c. Pensions, annuities, or life insurance payments \$ N/A [dollar amount or "none"].
- d. Gifts or inheritances \$ N/A [dollar amount or "none"].
- e. Any other sources \$ N/A [dollar amount or "none"].

7. \$ N/A of the \$ N/A amount listed in Paragraph 6 of this Affidavit comes from _____ [describe source].

8. \$ N/A of the \$ N/A amount listed in Paragraph 6 of this Affidavit comes from _____ [describe source].

[Continue with description of source for each sum
received in last 12 months]

9. I currently have the following amount in my possession in cash: \$ 201.67 [dollar amount or "none"].

10. I currently have the following amounts available in banks or other financial institutions: 2

Checking account	<u>N/A</u>	[Name of bank]	\$ _____
Savings account	<u>N/A</u>	[Name of bank]	\$ _____
_____	<u>N/A</u>	[Name of institution]	\$ _____

[Type of account, e.g.,

090

2

Brokerage] account

[Continue listing all accounts]

11. I own [an interest in] see Addendum [the following or no] real property. [Add if property owned: _____ (Description, e.g., A dwelling house located at _____ (address) with equity in the amount of \$_____.)]

12. I own See Memorandum [the following or no] stocks and bonds. [If property owned, list by description, amount, and current value: These include _____.]

13. I own N/A [the following or no] automobiles. [Add if autos owned: I own _____ (make and model of all automobiles).]

14. see Addendum [The following persons or _____] owes me money. [Add if money owed: I am owed _____ (set out sum owed and identity of each debtor)]

15. I own See addendum [the following or no] additional valuable property other than ordinary household furnishings and clothing. [Add if additional property owned: I own _____ (describe each property and its value)]

16. The following persons are dependent on me for their support: 3

N/A

<i>Identity</i>	<i>Relationship</i>	<i>Amount of Support</i>
_____ [Name]	Spouse	\$ _____
_____ [Initials]	Minor child	\$ _____
_____ [Initials]	Disabled child	\$ _____

ADDENDUM

I own interest in some properties (possesory interest and tenancy rights. they are as follows. (Real property)

1. 32-38 North main street, Dayton, Ohio-45402

2. 7600, bayway drive, Baytown, Texas-77520

Persons and individuals owes money.

There are numerous individuals owes money for my services and the spiritual products supplied to them. I do not have a complete list of all those people with their right mailing addresses with the correct legal names in my custody now.

Additional valuable property other than Real property

Several valuable property which I had were misappropriated by the RICO enterprise with its members help and conduct which exceeds over \$ 750 million now, plus some other properties were also misappropriated apart from the Trade Secrets by some other parties who still, I am investigation the legal names and correct address of them.

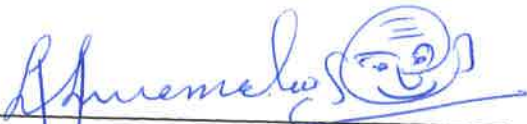
END OF ADDENDUM

17. Because of poverty, I am unable to pay the initial costs and fees required to proceed in this action or to give security for those costs and fees. Therefore, I believe that I am entitled to relief under the provisions of 28 U.S.C. § 1915(a)(1).

18. I desire to bring this action in good faith, and I believe that I am entitled to the relief that I have asked for by means of this action.

I, Annamalai Annamalai, a/k/a Swamiji Sri Selvam Siddhar, a/k/a
Commander Selvam DECLARE under penalty of perjury Pursuant to
28 U.S.C. 1746, that the foregoing is true and correct to the best
of my knowledge and Beliefs.

Respectfully Submitted this day of 29, February, 2016.




Annamalai Annamalai
a/k/a
Swamiji Sri Selvam Siddhar
a/k/a Commander Selvam

Inmate Inquiry



Inmate Reg #: 56820379 Current Institution: Marion USP
 Inmate Name: ANNAMALAI, ANNAMALAI Housing Unit: MAR-I-A
 Report Date: 02/22/2016 Living Quarters: 101-004L
 Report Time: 12:45:54 PM

General Information | Account Balances | Commissary History | Commissary Restrictions | Comments
General Information

Administrative Hold Indicator: No
 No Power of Attorney: No
 Never Waive NSF Fee: No
 Max Allowed Deduction %: 100
 PIN: 4506
 PAC #: 223766446
 Revalidation Date: 1st
 FRP Participation Status: Participating
 Arrived From: OKL
 Transferred To:
 Account Creation Date: 11/20/2013
 Local Account Activation Date: 11/24/2015 3:20:34 AM
 Sort Codes: 
 Last Account Update: 2/20/2016 9:12:33 PM
 Account Status: Active
 Phone Balance: \$2.85

Pre-Release Plan Information

Target Pre-Release Account Balance: \$0.00
 Pre-Release Deduction %: 0%
 Income Categories to Deduct From: ☒ Payroll ☒ Outside Source Funds

FRP Plan Information

FRP Plan Type	Expected Amount	Expected Rate
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AUTHORIZED BY THE ACT OF JULY 7, 1905
 TO (18 U.S.C. 4005) ADMITTED CATHS

Account Balances

Account Balance: \$201.07
 Pre-Release Balance: \$0.00
 Debt Encumbrance: \$0.00
 SPO Encumbrance: \$0.00
 Other Encumbrances: \$0.00
 Outstanding Negotiable Instruments: \$0.00

AUTHORIZED BY THE ACT OF JULY 7, 1905
 TO (18 U.S.C. 4005) ADMITTED CATHS

2/22/16

Administrative Hold Balance: \$0.00
 Available Balance: \$201.07
 National 6 Months Deposits: \$1,985.79
 National 6 Months Withdrawals: \$1,979.98
 Available Funds to be considered for IFRP Payments: \$1,535.79
 National 6 Months Avg Daily Balance: \$238.62
 Local Max. Balance - Prev. 30 Days: \$371.88
 Average Balance - Prev. 30 Days: \$203.04

Commissary History

Purchases

Validation Period Purchases: \$372.60
 YTD Purchases: \$1,129.95
 Last Sales Date: 2/16/2016 11:36:27 AM

SPO Information

SPO's this Month: 0
 SPO \$ this Quarter: \$0.00

Spending Limit Info

Spending Limit Override: No
 Weekly Revalidation: No
 Bi-Weekly Revalidation: No
 Spending Limit: \$360.00
 Expended Spending Limit: \$359.95
 Remaining Spending Limit: \$0.05

Commissary Restrictions

Spending Limit Restrictions

Restricted Spending Limit: \$0.00
 Restricted Expended Amount: \$0.00
 Restricted Remaining Spending Limit: \$0.00
 Restriction Start Date: N/A
 Restriction End Date: N/A

Item Restrictions

List Name	List Type	Start Date	End Date	Active
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AO 240A (Rev. 01/09) Order to Proceed Without Prepaying Fees or Costs

UNITED STATES DISTRICT COURT

for the

Swamiji Sri Selvam Siddhar

Plaintiff

VIOLET RAJKUMAR

Defendant et al.

Civil Action No. _____

ORDER TO PROCEED WITHOUT PREPAYING FEES OR COSTS

IT IS ORDERED: The plaintiff's application under 28 U.S.C. § 1915 to proceed without prepaying fees or costs is:

☐ Granted:

The clerk is ordered to file the complaint and issue a summons. The United States marshal is ordered to serve the summons with a copy of the complaint and this order on the defendant(s). The United States will advance the costs of service. Prisoner plaintiffs are responsible for full payment of the filing fee.

☐ Granted Conditionally:

The clerk is ordered to file the complaint. Upon receipt of the completed summons and USM-285 form for each defendant, the clerk will issue a summons. If the completed summons and USM-285 forms are not submitted as directed, the complaint may be dismissed. The United States marshal is ordered to serve the completed summons with a copy of the complaint and this order on the defendant(s). The United States will advance the costs of service. Prisoner plaintiffs are responsible for full payment of the filing fee.

☐ Denied:

This application is denied for these reasons:

Date: _____

*Judge's signature*_____
Printed name and title